

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: FRANCHISE GROUP, INC. et al., ¹ Debtors.	Chapter 11 Case No. 24-12480 (JTD) (Jointly Administered) Hearing date: May 6, 2025 @ 11:30 am (ET) Objection deadline: April 15, 2025 @ 4:00 pm (ET)
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**NOTICE OF MOTION OF GRANITE TELECOMMUNICATIONS, LLC FOR
ALLOWANCE AND PAYMENT OF ADMINISTRATIVE CLAIM**

PLEASE TAKE NOTICE that on April 1, 2025, Granite Telecommunications, LLC (the “Movant”) filed the *Motion of Granite Telecommunications, LLC for Allowance and Payment of Administrative Claim* (“Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion must be in writing, in conformity with the Federal Rules of Bankruptcy Procedure and the Local Rules of

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy’s Newco, LLC (5404), Buddy’s Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260); Franchise Group Newco BHF, LLC (4123); Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies “Plus”, LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors’ headquarters is located at 109 Innovation Court, Suite J, Delaware, Ohio 43015.

the Bankruptcy Court and filed with the Court, so as to be received on or before **April 15, 2025, at 4:00 p.m. (Eastern Time)** (“Objection Deadline”). At the same time, you must also serve a copy of the response upon undersigned counsel.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **May 6, 2025 at 11:30 a.m. (Eastern Time)**, before the Honorable John T. Dorsey in the Bankruptcy Court, 824 North Market Street, 5th Floor, Courtroom #5, Wilmington, Delaware 19801.

IF YOU DO NOT TAKE THESE STEPS BY THE OBJECTION DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 1, 2025
Wilmington, Delaware

GELLERT SEITZ BUSENKELL & BROWN, LLC

By: /s/ Ronald S. Gellert

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